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*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION TO SEAL  
JOINT CASE MANAGEMENT  
STATEMENT**

**[PROPOSED] ORDER**

Before the Court is Defendant Google LLC's Administrative Motion to Seal portions of the parties' Joint Case Management Statement ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document Sought to Be Sealed	Party Claiming Confidentiality	Court's Ruling on Motions to Seal	Basis for Sealing Portion of Document
Joint Case Management Statement	Google	GRANTED as to redacted portions at:  page 4, lines 26-27; page 5, lines 3-10, 20-23; page 7, lines 17-28; page 8, lines 1-2; page 9, lines 26-28; page 10, lines 1-5, 10-11, 13-18; page 11, lines 5, 7-10, 13-15; page 12, lines 19-22; page 13, line 13; page 16, lines 2-3, 5-11, 13-14.	Narrowly tailored to protect highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to cookies, internal identifiers and various data logs maintained by Google, as well as Google's internal communications and practices with regard to Incognito, X-Client-Data Header and their proprietary functions, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. LUCY H. KOH  
United States District Judge